

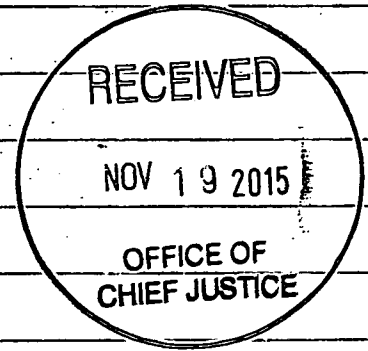
EDWARD BRIGGS #349046  
M.C.I. C-1-A-12  
1516 OLD GILLIARD RD  
RIDGEVILLE S.C. 29472

**RECEIVED**

NOV 19 2015

DATE 11-16-2015

**S.C. SUPREME COURT**



SUPREME COURT JUSTICE  
HON: JEAN TOALO  
1231 GERVAIS ST.  
COLUMBIA, S.C. 29201

RE: CLOCK STAMP IN FILE BOOK AND RETURN  
CLOCKED COPY FOR RECORD.

DEAR CLERK

PLEASE CLOCK STAMP THIS WRIT IN YOUR FILE  
BOOK AND RETURN CLOCK COPY TO ME.

AND PLEASE GIVE OUR SUPREME COURT JUSTICE A  
COPY TO PASS HER RULING ON.

THANK YOU

Edward Briggs

IN THE SUPREME COURT  
OF SOUTH CAROLINA  
FROM SUMTER COUNTY

VS

EDWARD BRIGGS #349046  
**RECEIVED**  
DEFENDANT

NOV 19 2015

S.C. SUPREME COURT

IN THE SUPREME  
COURT SESSION,

4<sup>TH</sup>

SOUTH CAROLINA  
JUDICIAL CIRCUIT

OUT OF 3<sup>TH</sup> CIRCUIT

P.C.R. CASE No:  
12-CP-45-121

RE: MOTION: FOR WRIT OF MANDAMUS

THEREFORE, NOW COMES DEFENDANT IN A PRO-SE MOTION FOR WRIT OF MANDAMUS. TO HAVE HIGHER COURT MAKE LOWER COURT DO THERE DUTY FOR THE FOLLOWING REASONS.

DEFENDANT WENT IN FRONT OF THE HON: GEORGE C. JAMES FOR P.C.R. WITH FULTON CASEY DALE CORNWELL AS DEFENDANT'S COUNSEL. TWO OF DEFENDANT'S CHARGES WERE STATED TO HIM .5. YEARS ON THE DRUG CHARGE, WHICH CARRIED ONLY .3. YEARS AND A GUN CHARGE THAT ONLY CARRIED .1. YEAR. HE WAS TOLD .5. YEARS, PLUS THERES A JURISDICTION ISSUE IN THE A.B.HAN. CHARGE. THE HON: GEORGE C. JAMES. BROUGHT ALL THIS TO LIGHT IN THE P.C.R. HEARING. AND QUESTION THE ATTORNEY GENERAL ON THIS BY STATING TO HIM. ~~DONT~~ YOU THINK IT MADE A DIFFERENT TO THE DEFENDANT ON HIS PLEA.

PAGE 1. OF.

Edward Briggs  
DEFENDANT

WHEN THE CHARGE WAS STATED MORE TIME THAN IT CARRIED,  
THIS IS A JUDICIAL ERROR, PROSECUTION MIS CONDUCT,  
AND INEFFECTIVE OF ASSISTANCE OF COUNSEL.

DEFENDANT HAS WROTE COUNSEL [2.] DIFFERENT LETTERS  
REQUESTING COUNSEL TO DO A ORDER GRANTING RELIEF  
AND A MEMORANDUM MIRRORING THE ORDER GRANTING  
RELIEF. BUT LETTERS ARE RETURNED UNOPEN.

DEFENDANT HAS THE MAJOR OF THE PRISON MR. CHANG  
MAKE CALLS FOR HIM [3.] TIMES, THAT'S ON RECORDED  
MARCH-3-2015, APRIL-4-2015, MAY-12-2015 NO ANSWER  
TO CALLS, DEFENDANT SENT TO P.C.R. JUDGE-JAMES A Clocked  
ORDER BY THE CLERK REQUESTING RELIEF OCT-6. 2015 NO  
ANSWER, DEFENDANT SENT SECOND LETTER OCT-21-2015. THEN  
COUNSEL MAKES ONE CALL TO DEFENDANT'S MOTHER, AND STATES  
I AM NOT HIS LAWYER.

DEFENDANT REQUEST THIS HONORABLE SUPREME COURT.  
TO MAKE COUNSEL DO HIS DUTY AND DRAFT A ORDER  
GRANTING RELIEF AND A MEMORANDUM MIRRORING  
THE ORDER.

UNDER FOSTER V. STATE 298 S.C. 306, 379 S.E. 2D 907  
[1989] ATTORNEY IS TO BE APPOINTED TO FOSTER A CASE  
SO ITS NOT TANTED AT A LATER DATE. EVITT'S V.  
LUCEY, 469 U.S. 387, 83 L. ED. 2D 821 [1985] SIXTH  
AMENDMENT RIGHT TO EFFECTIVE ASSISTANCE OF COUNSEL  
EXTENDS TO FIRST APPEAL AS OF RIGHT. IF FULTON  
CASEY DALE CORNWELL ESQUIRE, HAD STATED ON RE-  
CORD. GLOVER V. UNITED STATES, 531 U.S. 198. 203, 148  
L. ED. 2D 604 [2001]

IN ASSESSING WHETHER COUNSEL'S DEFICIENT PERFORMANCE PREJUDICED A DEFENDANT, "ANY AMOUNT OF ACTUAL JAIL TIME HAS SIXTH AMENDMENT SIGNIFICANCE.

AND HAD TRANSCRIPT PRODUCE FROM COURT REPORTER MELISSA SINGLETARY. THE COUNSEL MR. CORNWELL COULD HAVE DONE A ORDER GRANTING RELIEF AND A MEMORANDUM MIRRORING THE ORDER. DEFENDANT REQUEST THAT COUNSEL DO HIS DUTY AND THE HONORABLE JUDGE JAMES SIGN OFF ON THE ORDER. SO DEFENDANT CAN GO TO THE NEXT LEVEL OF HIS CASE.

WHEREFORE DEFENDANT PRAYS THIS WRIT OF MANDAMUS IS GRANTED IN THE INTEREST OF JUSTICE.

Edward Briggs  
DEFENDANT

PROOF OF SERVICE

BEING DULY SWORN, I STATE AND DEPOSE THAT ALL IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, WHERE STATED TO BE TRUE AND CORRECT.

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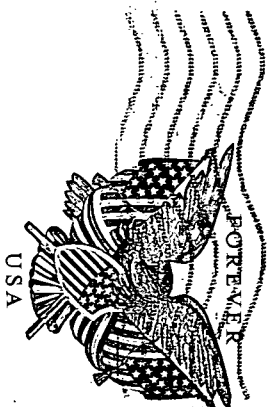
Edward Briggs  
DEFENDANT

S.C. SUPREME COURT

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Edward Briggs #349046-  
MacDougall Corr. Inst. C1-A1A2A  
1516 Old Gilliard Rd.  
Ridgville, S.C. 29472

CHARLESTON SC 294  
17 NOV 2015 PM 11



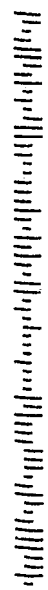
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MacDougall Corr. Inst.  
Mailroom

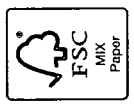
29201-83235

Supreme Court Justice  
Hon. Sean Torlo  
1231 GERVAIS ST.  
Columbia, S.C. 29221



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